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July 30, 1985
RBG-21723
File No. G9.5

Mr. Harold R. Denton, Director
Office of Nuclear Reactor Regulation
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555

Dear Mr. Denton:

River Bend Station - Unit 1
Docket No. 50-458

As discussed in previous submittals and meetings, Gulf States Utilities intends to implement provisions to ensure that the qualified load level of the Transamerica Delaval, Inc. (TDI) Emergency Diesel Generators is not exceeded. The purpose of this letter is to document our commitments in response to the five issues identified in Enclosure 1.

Sincerely,

J. E. Booker

J. E. Booker
Manager-Engineering,
Nuclear Fuels & Licensing
River Bend Nuclear Group

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ENCLOSURE 1

Issue No. 1: No single operator error should cause the loading of more than one TDI diesel generator in excess of its qualified load rating.

Response: GSU has reviewed this concern and found that no single operator error would cause the loading of more than one TDI diesel generator in excess of its qualified load rating.

Issue No. 2: Procedures and Training in place at River Bend should not call for an operator action that would cause the EDG load to exceed the qualified load.

Response: Abnormal Operating Procedure AOP-0004, "Loss of Offsite Power," does not call for operator actions that would cause the EDG load to exceed the qualified load. Furthermore, procedure AOP-0004, the diesel operating procedure SOP-0053, and the surveillance tests procedures all contain caution statements to alert the operator to maintain the EDG load within the qualified load. Training is addressed in the response to Issue No. 3 of this letter.

Issue No. 3: The training program should adequately address the technical concerns associated with the qualified load limit on the EDG's.

Response: Technical concerns associated with the qualified load limit on the EDG's was addressed in the License Operator Requalification Training. Module 1, day 5 was devoted to Diesel Generator Operation. This training began on June 10 and was completed June 30. The training program emphasized the need to maintain the EDG load within the qualified load.

Issue No. 4: If a situation were to occur that would, for some unspecified failure, cause the EDG to exceed the qualified load, the procedures and training should provide the necessary guidance to reduce the load below the qualified load within one hour.

Response: An Alarm Response Procedure will be prepared prior to initial criticality which will provide guidance to the operator in the unlikely event that some unspecified failure should cause the standby diesel generators to exceed the qualified load. The guidance will specify that the load reduction should be completed within one hour.

Issue No. 5: Distinctive and unique instrumentation and alarms should exist to warn the operators when the EDG's are loaded above the qualified load.

Response:

Annunciators are provided in the Main Control Room and at the standby diesel generator local panels which will activate when the standby

diesels are loaded above the qualified load. The alarm setpoint will be maintained at or below the qualified load. The alarm will be tested daily by the annunciator test feature.